

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

NOT EXEMPT UNDER 44 U.S.C. 3512

DO NOT WRITE IN THIS SPACE	
Case 20-CB-9986-1	Date Filed 6/13/95

INSTRUCTIONS: File an original and 4 copies of this charge and an additional copy for each organization, each local, and each individual named in Item 1 with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT		
a. Name CALIFORNIA NURSES ASSOCIATION	b. Union Representative to contact Williard Hatch and Janet Sass-McDermott	
c. Telephone No. (916) 446-5021	d. Address (street, city, state and ZIP code) CNA Sacramento 1100-11th Street, Suite 200, Sacramento, CA 95814	
e. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) <u>(1); (2); 9(a)</u> of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.		
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) <p style="text-align: center;">See attached.</p>		
3. Name of Employer Kaiser Permanente, Kaiser Foundation Hospitals and the Permanente Medical Group, Inc.		4. Telephone No. (916) 973-5000
5. Location of plant involved (street, city, state and ZIP code) 2025 Morse Avenue, Sacramento, CA 95825-2115		6. Employer representative to contact Leslie Pratt, Sue Ostro Robert M. Brosnan, Jeanne Bollinger
7. Type of establishment (factory, mine, wholesaler, etc.) Health Care	8. Identify principal product or service Health Care	9. Number of workers employed Unknown
10. Full name of party filing charge Lucia Stevenson		
11. Address of party filing charge (street, city, state and ZIP code) 1114 Meadow Gate, Roseville, CA 95661		12. Telephone No. (916) 784-7526
13. DECLARATION		
I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.		
By <u>Lucia C. Stevenson</u> (signature of representative or person making charge)		(title or office, if any)
Address 1114 Meadow Gate, Roseville, CA 95661		(916) 784-7526 (Telephone No.)
		06/12/95 (date)

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Attachment to Charge Against Labor Organization and Its Agents

2. Basis of the charge

By arbitrarily, discriminatorily, and violating good faith requirement, CNA, and its representatives including, but not limited, to Janet Sass McDermott have negatively impacted Lucia Stevenson, vis-a-vis, her job assignment(s), duties, responsibilities, all thereby subjecting Ms. Stevenson to the spectra of demotion and/or loss of seniority, loss of other terms and conditions of employment including wages and benefits, and potential loss of employment thereby resulting in an apparently viable wrongful discharge all due to Ms. Stevenson being "temporary loaned" to a management position within Kaiser Permanente Hospital in Sacramento. The loan of Ms. Stevenson's position within the Kaiser Sacramento operation to a management category was done and accomplished with the full, express and knowing actions of the current Kaiser management due to an extensive past pattern of practice of Kaiser Permanente Hospital and related facilities. CNA now apparently throughout its Union representation process, and in particularly with respect to Janet Sass McDermott, denies the existence of said past pattern of practice all to the detriment of Ms. Lucia Stevenson. Moreover CNA and in particular Janet Sass McDermott, have denied Ms. Lucia Stevenson the required and necessary representation that CNA is obligated to perform on her behalf in dealing with and negotiating with Kaiser within the parameters of this past pattern of practice and the existing Collective Bargaining Agreement to assure that Ms. Lucia Stevenson is not negatively impacted by an apparent recent political and adversarial relationship by and between CNA and Kaiser management. As a result thereof, it appears that CNA generally and specifically and including, but limited to, Janet Sass McDermott as CNA's representative have developed a personal animosity toward Ms. Stevenson and promote overtly and covertly a personal and political favoritism towards others including, but not limited to, individual CNA union members all to the detriment of Ms. Stevenson thereby significantly impacting Ms. Stevenson's employment status and her long standing Union designated position, thereby creating the likely and real negative impact on her salary, wages, benefits and Union security and, as noted above, the present real threat of loss of employment which would result in a wrongful discharge.

It is patently obvious that the dispute is by and between Kaiser Sacramento and CNA due to perceptions, attitudes and relationships while extending past, pattern and practices, none of which Ms. Stevenson promoted or authored by, rather Ms. Stevenson, upon representations that a past, pattern and practice existed by Kaiser relied upon those representations that her assignment via a loan position to a management position would not create any detrimental impact on her wages, hours or working condition. Rather, the reverse has been true, verbal and/or written threat by CNA and Janet Sass McDermott specifically, none of which has been resolved to the present and therefore require the filing of this charge.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**CHARGE AGAINST LABOR ORGANIZATION
OR ITS AGENTS**

DO NOT WRITE IN THIS SPACE	
Case 20-CB-9986-2	Date Filed 6/12/95

INSTRUCTIONS: File an original and 4 copies of this charge and an additional copy for each organization, each local, and each individual named in item 1 with the NLRB Regional Director of the region in which the alleged unfair labor practice occurred or is occurring.

1. LABOR ORGANIZATION OR ITS AGENTS AGAINST WHICH CHARGE IS BROUGHT

a. Name CALIFORNIA NURSES ASSOCIATION	b. Union Representative to contact Williard Hatch and Janet Sass McDermott
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c. Telephone No. (916) 446-5021	d. Address (street, city, state and ZIP code) CNA Sacramento 1100 - 11th Street, Suite 200, Sacramento, CA 95814
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e. The above-named organization(s) or its agents has (have) engaged in and is (are) engaging in unfair labor practices within the meaning of section 8(b), subsection(s) (list subsections) (1); (2); 9(a) of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See attached.

3. Name of Employer Kaiser Permanente, Kaiser Foundation Hospitals and the Permanente Medical Group, Inc.	4. Telephone No. (916) 973-5000
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5. Location of plant involved (street, city, state and ZIP code) 2025 Morse Avenue, Sacramento, CA 95825-2115	6. Employer representative to contact Leslie Pratt, Sue Ostrc Robert M. Brosnan Jeanne Bollinger
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7. Type of establishment (factory, mine, wholesaler, etc.) Health Care	8. Identify principal product or service Health Care	9. Number of workers employed Unknown
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10. Full name of party filing charge Dawn Lambie

11. Address of party filing charge (street, city, state and ZIP code) 2617 Swindon Court, Rocklin, CA 95765	12. Telephone No. (916) 632-0939
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13. DECLARATION

I declare that I have read the above charge and that the statements therein are true to the best of my knowledge and belief.

By *Dawn Lambie* Attorneys for Dawn Lambie
(signature of representative or person making charge) (title or office, if any)

Address 1000 "G" Street, 2nd Floor (916) 449-3800 06/12/95
(Telephone No.) (date)
Sacramento, California 95814

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Attachment to Charge Against Labor Organization and Its Agents

2. Basis of the Charge

By arbitrarily, discriminatorily, and violating good faith requirement, CNA, and its representatives including, but not limited, to Janet Sass McDermott have negatively impacted Dawn Lambie, vis-a-vis, her job assignment(s), duties, responsibilities, all thereby subjecting Ms. Lambie to the spectra of demotion and/or loss of seniority, loss of other terms and conditions of employment including wages and benefits, and potential loss of employment thereby resulting in an apparently viable wrongful discharge all due to Ms. Lambie being "temporary loaned" to an education position within Kaiser Permanente Hospital in Sacramento. The loan of Ms. Lambie's position within the Kaiser Sacramento operation to an educator category was done and accomplished with the full, express and knowing actions of the current Kaiser management due to an extensive past pattern of practice of Kaiser Permanente Hospital and related facilities. CNA now apparently throughout its Union representation process, and in particularly with respect to Janet Sass McDermott, denies the existence of said past pattern of practice all to the detriment of Ms. Dawn Lambie. Moreover CNA and in particular Janet Sass McDermott, have denied Ms. Dawn Lambie the required and necessary representation that CNA is obligated to perform on her behalf in dealing with and negotiating with Kaiser within the parameters of this past pattern of practice and the existing Collective Bargaining Agreement to assure that Ms. Dawn Lambie is not negatively impacted by an apparent recent political and adversarial relationship by and between CNA and Kaiser management. As a result thereof, it appears that CNA generally and specifically and including, but limited to, Janet Sass McDermott as CNA's representative have developed a personal animosity toward Ms. Lambie and promote overtly and covertly a personal and political favoritism towards others including, but not limited to, individual CNA union members all to the detriment of Ms. Lambie thereby significantly impacting Ms. Lambie's employment status and her long standing Union designated position, thereby creating the likely and real negative impact on her salary, wages, benefits and Union security and, as noted above, the present real threat of loss of employment which would result in a wrongful discharge.

It is patently obvious that the dispute is by and between Kaiser Sacramento and CNA due to perceptions, attitudes and relationships while extending past, pattern and practices, none of which Ms. Lambie promoted or authored by, rather Ms. Lambie, upon representations that a past, pattern and practice existed by Kaiser relied upon those representations that her assignment via a loan position to an education position would not create any detrimental impact on her wages, hours or working condition. Rather, the reverse has been true, verbal and/or written threat by CNA and Janet Sass McDermott specifically, none of which has been resolved to the present and therefore require the filing of this charge.